

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2549
DIRECT EMAIL rkaplan@kaplanhecker.com

November 12, 2019

By CM/ECF

The Chambers of the Honorable Judge LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-civ-05680-LDH-SJB

Dear Judge DeArcy Hall,

We write to bring to the Court's attention the attached transcript from the parties' discovery conference before Magistrate Judge Bulsara last week, during which Judge Bulsara declined Plaintiffs request to lift the discovery stay to seek documents or information from our client, Defendant Moira Donegan.

We believe that statements made by counsel for Plaintiff Stephen Elliott during the November 6 conference shed light on Plaintiff's reasons for suing Ms. Donegan in the first place and only serve to reinforce why the Court should grant our motion to dismiss the Second Amended Complaint.

Respectfully submitted,



Roberta A. Kaplan, Esq.
Kaplan Hecker & Fink LLP

Counsel for Defendant Moira Donegan